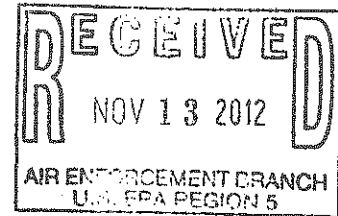


NOV 13 2012



November 7, 2012

Mr. George Czerniak  
Acting Director  
Air and Radiation Division  
U.S. Environmental Protection Agency, Region 5  
77 West Jackson  
Chicago, IL 60604-3507



RE: Veolia ES Technical Solutions, L.L.C.  
163121AAP  
40 CFR 1207(i) – Time Extension for Subsequent Performance Tests as Defined in  
Subpart EEE – National Emission Standards for Hazardous Air Pollutants from  
Hazardous Waste Combustors

Dear Mr. Czerniak,

Veolia ES Technical Solutions, L.L.C. pursuant to 40 CFR 63.1207(i), is requesting a time extension for conducting the comprehensive performance tests at Incinerators 2, 3 and 4 as provided for by 40 CFR Subpart EEE - National Emission Standards for Hazardous Air Pollutants from Hazardous Waste Combustors.

On September 5, 2012, Veolia submitted to USEPA and IEPA, Comprehensive Performance Test (CPT) Plans for Incinerators 2, 3 and 4. As communications between USEPA and Veolia has indicated, there is some confusion as to the planning and timing of these subsequent CPT's. Veolia conducted the last CPT's in December, 2009 that would have put the next scheduled tests in late 2014. However, at the Agency's request and determination, testing is to be conducted in 2013, Veolia did submit CPT Plans in September, 2012. As a result of this accelerated schedule that Veolia did not anticipate, Veolia is requesting extensions to the testing schedule. These extensions are being requested due to the complexity of the approval of three plans by the Agency, preparation of these tests that include preparing the waste feeds and spiking material (can take several months to order and prepare spiking material), scheduling the stack testing consultant and rearranging the incoming waste loads to accommodate the test schedule. Since three units are to be tested concurrently, separating the timing of testing for these units will allow the Agency enough time to adequately review and approve the CPT plans and allow Veolia adequate time to properly prepare for the testing to ensure that all the required regulations are being met.

Veolia is requesting a four month extension for testing Unit 4 and a one year extension for testing Units 2 and 3 from the date of September 5, 2013. These extensions would allow the Agency and Veolia to ensure that all regulatory requirements are met to not only satisfy the regulatory community but also to satisfy the public that these incinerators are in compliance with all required regulations.

Mr. Czerniak  
November 7, 2012  
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I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted, is to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Upon review of this request, should the Agency have any questions or need for additional information or questions, please contact Dennis Warchol at (618) 271-2804 or via e-mail at [Dennis.Warchol@Veoliaes.com](mailto:Dennis.Warchol@Veoliaes.com) or me at (618) 271-2804 or via e-mail at [Doug.Harris@Veoliaes.com](mailto:Doug.Harris@Veoliaes.com).

Sincerely,

  
Doug Harris  
General Manager

Att.

cc: EPA File